

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

*In re: Clearview AI, Inc. Consumer Privacy
Litigation*

Civil Action File No.: 1:21-cv-00135

Judge Sharon Johnson Coleman

Magistrate Judge Maria Valdez

JOINT STATUS REPORT ON DISCOVERY

Pursuant to the Court's January 13, 2023 Order (Dkt. 521), Plaintiffs; Defendants Clearview AI, Inc. ("Clearview"), Hoan Ton-That, Richard Schwartz, Rocky Mountain Data Analytics LLC ("Rocky Mountain"), and Thomas Mulcaire (collectively, the "Clearview Defendants"); and Defendants Macy's, Inc., Macy's Retail holdings, Inc. (n/k/a Macy's Retail Holdings, LLC), and Macy's Corporate Services, Inc (n/k/a Macy's Corporate Services, LLC) (collectively, the "Macy's Defendants"), by and through their respective counsel, file this Joint Status Report on Discovery.

I. DOCUMENT PRODUCTION

All parties represent that they have completed document production. The Macy's Defendants completed their production on March 6, 2023, and Plaintiffs are in the process of reviewing their recent productions for completeness. The completeness of the Clearview Defendants' production is the subject of Plaintiffs' Motion for Discovery Sanctions against the Clearview Defendants (Dkt. 474) and the Clearview Defendants' Motion for Protective Order (Dkt. 471) (collectively, the "Pending Discovery Motions"), and is the subject of ongoing meet and confer discussions among the Macy's Defendants and the Clearview Defendants. Responses

to the Pending Discovery Motions are due on April 4, 2023, and replies are due on April 18, 2023.

II. PENDING DISCOVERY MOTIONS

As noted above, responses to the Pending Discovery Motions are due on April 4, 2023, and replies are due on April 18, 2023.

III. ORAL DISCOVERY

Depositions of the named Plaintiffs were previously noticed for October 27-November 4, 2022. Those depositions were continued in light of motion practice relating to designation of interim lead class counsel and subsequent efforts to mediate between Plaintiffs and the Clearview Defendants, which mediation concluded unsuccessfully on March 7, 2023. Pursuant to the Court's Order of March 6, 2023 (Dkt. 523), depositions of fact witnesses are to be concluded by June 5, 2023. The parties are currently conferring on deposition dates and anticipate completing depositions of fact witnesses within the current deadline.

Dated: March 8, 2023

Respectfully submitted:

By: /s/ Jon Loevy
JON LOEVY

Plaintiffs' interim lead class counsel

By: /s/ Daniel R. Saeedi
DANIEL R. SAEEDI

Counsel for the Macy's Defendants

By: /s/ James Thompson
JAMES THOMPSON

Counsel for the Clearview Defendants

Counsel for Other Plaintiffs:

Frank Hedin
Joshua Arisohn
Scott Drury
Steven Webster
Michael Drew
Michael Wood

CERTIFICATE OF SERVICE

I, Thomas M. Hanson, an attorney, hereby certify that, on March 8, 2023, I filed the foregoing document using the Court's CM/ECF system, which effected service on all counsel of record.

/s/
Thomas M. Hanosn